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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

CHRISTOPHER DOYON,

Defendant.

) Case No.: CR 11-00683 BLF
) CR 12-00426 BLF

) **STIPULATION TO CONTINUE CHANGE OF**
) **PLEA HEARING AND EXCLUDING TIME**
) **UNDER THE SPEEDY TRIAL ACT;**
) **[PROPOSED] ORDER**

The undersigned parties respectfully request that the change of plea hearing scheduled for January 11, 2022 be continued to January 18, 2022 at 9:00 a.m. The reason for the continuance is to afford the parties additional time to complete a Rule 20 transfer of the defendant's case from the Middle District of Florida to the Northern District of California. Defense counsel is continuing to investigate the offenses charged in the Florida matter, including the loss amount proposed by the Government for purposes of calculating the sentencing guidelines.

The parties also stipulate and agree to an exclusion of time from January 11, 2022 to January 18, 2022 to allow for the effective preparation of defense counsel. *See* 18 U.S.C. § 3161(h)(7)(B)(iv).
IT SO STIPULATED.

1 DATED: 1/7/22

Respectfully submitted,

2 STEPHANIE M. HINDS
3 Acting United States Attorney

4 /s/ Susan Knight
5 SUSAN KNIGHT
6 Assistant United States Attorney

7 /s/ Jay Rorty
8 JAY RORTY
9 Counsel for Mr. Doyon

10 **[PROPOSED] ORDER**

11 Accordingly, for good cause shown, the Court ORDERS that the change of plea hearing
12 currently scheduled for January 11, 2022 is continued to January 18, 2022 at 9:00 a.m.

13 The Court FURTHER ORDERS that time be excluded under the Speedy Trial Act from January
14 11, 2022 through January 18, 2022. The Court finds, based on the aforementioned reasons, that the ends
15 of justice served by granting the requested continuance outweigh the best interest of the public and the
16 defendant in a speedy trial. The failure to grant the requested continuance would deny defense counsel
17 reasonable time necessary for effective preparation, taking into account the exercise of due diligence,
18 and would result in a miscarriage of justice. The Court therefore concludes that this exclusion of time
19 should be made under 18 U.S.C. §§ 3161(h)(7)(A) and (B)(iv).

20 IT IS SO ORDERED.

21 DATED:

22 HONORABLE BETH LABSON FREEMAN
23 United States District Judge
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